

Via ECF

October 1, 2024

Hon. Lorna G. Schofield  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re:    *The Travelers Indem. Co., et al. v. Northrop Grumman Corp., et al.*,  
      Case No. 16-civ-8778-LGS [rel. 1:12-cv-03040-KBF]**

Dear Judge Schofield:

Pursuant to the Court's October 12, 2022 Order (ECF 469) ("Stay Order"), and the Court's July 9, 2024 Order amending the Stay Order (ECF 491), we write on behalf of The Travelers Indemnity Company and The Travelers Indemnity Company of Connecticut ("Travelers"), Century Indemnity Company ("Century"), and Northrop Grumman Corporation and Northrop Grumman Systems Corporation ("NG") (collectively, "the Parties"), to provide an update regarding the status of the underlying *Romano* lawsuit. This is the fifteenth status letter in response to the Stay Order.

Consistent with the Parties' statements in their November 25, 2022 letter (ECF 472), the below is NG's status summary of the *Romano* lawsuit:

1. On September 30, 2024, the *Romano* court held a telephonic status conference. The parties reported that mediation is progressing with additional mediation sessions scheduled over the next few months. The court scheduled a further telephonic conference on January 6, 2025.
2. There have been no other developments in the *Romano* litigation since the parties' prior status letter, submitted on July 3, 2024 (ECF 490). As previously noted, until the mediation concludes, we expect few, if any, developments in the *Romano* litigation.
3. As noted in the July 10, 2023 status letter (ECF 480), the parties completed briefing the *Romano* plaintiffs' class certification motion and the parties' *Daubert* motions related to class certification experts. The completed briefing papers were filed with the court on June 7, 2023.
4. As noted in the February 20, 2024 status letter (ECF 487), in January 2024 the parties agreed to enter into mediation. In light of the anticipated mediation, the court removed the pending motions from the docket while mediation proceeds, stated it would promptly rule on the pending motions should mediation not succeed, and directed the parties to file a letter to restore the pending motions for rulings if mediation is unsuccessful.
5. As previously noted, the *Romano* court did not establish any deadlines for any proceedings after the completion of class certification briefing. Thus, there are no existing case deadlines at this time.

In accordance with the Stay Order, as amended, the Parties will file the next status letter regarding the *Romano* litigation on or before December 30, 2024.

Respectfully submitted,

SIMPSON THACHER & BARTLETT LLP

By: Lynn K. Neuner

Lynn K. Neuner  
Summer Craig  
425 Lexington Avenue  
New York, New York 10017-3954  
Tel.: (212) 455-2000  
Fax: (212) 455-2502  
lneuner@stblaw.com  
scraig@stblaw.com

*Attorneys for Plaintiffs The Travelers Indemnity  
Company and The Travelers Indemnity  
Company of Connecticut*

WHITE & WILLIAMS LLP

By: Shane R. Heskin

Shane R. Heskin  
Adam M. Berardi  
1650 Market Street  
One Liberty Place, Suite 1800  
Philadelphia, PA 19103-7395  
Tel: (215) 864-6329  
Fax: (215) 399-9603  
heskins@whiteandwilliams.com  
berardia@whiteandwilliams.com

*Attorneys for Nominal Defendant Century  
Indemnity Company, eventual successor in  
interest to Insurance Company of North  
America*

COVINGTON & BURLING LLP

By: Georgia Kazakis

Georgia Kazakis  
Daniel L. Russell Jr.  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Tel: (202) 662-6000  
gkazakis@cov.com  
drussell@cov.com

*Attorneys for Defendants Northrop Grumman  
Corporation and Northrop Grumman Systems  
Corporation*